

A F T E R N O O N S E S S I O N

JUDGE CHACHKIN: Back on the record, let's go.

BY MR. SHOOK:

Q Dr. Crouch, please turn to 270.

A Yes, sir, I'm there.

Q The bottom of the first page, the next-to-the-last paragraph beginning with "next was a most unusual problem."

A Yes, sir, I'm there.

Q All right, what I want you to focus on is the third sentence beginning with "we will salvage most of our equipment."

A Yes, I'm there.

Q Now, you have grouped there El Salvador, Portland, Oregon, and then "and other affiliated projects." Now is there supposed to be something significant here in terms of the grouping of El Salvador and Portland together, and then other affiliated projects?

A No, sir, I don't think so. I, I, I just in passing mentioned one of the foreign stations that would be impacted by this firm going bankrupt, as well as the Portland station that was evidently under construction at the same time, and I mentioned five large, full-power transmitters were under construction. I, I really wouldn't be able to tell you unless I looked further which other stations were impacted by this, this business failure on the part of our supplier of

1 equipment.

2 Q All right, I'd like you to generally look at three
3 exhibits at the same time, and it's not for purposes of study-
4 ing the particular exhibits. It would be 271, 272, and 275.
5 You'll notice that they are Form 990 for the year 1988 for
6 three different organizations, one being Trinity Broadcasting
7 of Florida, and that's Exhibit 271; National Minority TV,
8 Exhibit 272; and Trinity Christian Center of Santa Ana, Inc.,
9 in other words -- Exhibit 275.

10 A Yes, sir, I've, I've flipped to those three docu-
11 ments.

12 Q And the question that I have for you is these docu-
13 ments, insofar as TBN personnel are concerned, are all being
14 prepared by the same personnel, correct?

15 A To my knowledge, yes, sir. I, I beg your pardon.
16 Let, let me restate that. I believe these tax returns are
17 basically compiled by outside independent auditors --

18 Q Right, and insofar --

19 A -- and filed for --

20 Q My question was, insofar as there were TBN personnel
21 involved, because the TBN personnel would be identical for all
22 three returns.

23 A With the possible exception of Mrs. Duff as far as
24 National Minority is concerned. Whether or not she assisted
25 or was consulted in the preparation of the NMTV return, I have

1 no independent knowledge, but she certainly could have been.

2 Q Well, focusing on what you do have knowledge about,
3 wouldn't it be, wouldn't it be the case that the same TBN
4 personnel would have, would have been involved in the prepara-
5 tion of the information, the compilation of the information,
6 for all three returns?

7 A Certainly the same financial personnel.

8 Q Now turning specifically to Mass Media Exhibit 272,
9 which is the return for National Minority TV, consistent with
10 your earlier testimony, I take it you did not review this
11 return prior to its submission to the Internal Revenue
12 Service?

13 A I have no recollection of, of reviewing any of these
14 documents, no, sir.

15 Q Do you have any knowledge as to whether any director
16 of National Minority TV reviewed the Form 990 prior to its
17 submission to the Internal Revenue Service?

18 A I see that Charlene Williams, the director of
19 finance, signed this, and I believe, correct me if I'm wrong,
20 that she may have been a -- an assistant secretary of NMTV at
21 the time.

22 Q Yes, sir, my question was did any director of
23 National Minority TV review the return prior to its
24 submission --

25 A Not --

1 Q -- to the Internal Revenue Service?

2 A Not to my knowledge, sir.

3 Q Please turn to Mass Media Exhibit 274. Now this is
4 the newsletter for August 1989, and in the first paragraph
5 there's a reference to Community Educational Television, and
6 here it's identified as an affiliated network with the Trinity
7 Broadcasting Network. Now, other than the commonality of some
8 of the members of the boards of directors of both CET and
9 Trinity, and assuming, because we haven't seen them and I
10 don't believe they're in evidence, that there are program
11 affiliation agreements between the individual Community
12 Educational Television stations and Trinity, is there any
13 other relationship or documents that pertain to a relationship
14 between Trinity and, and CET?

15 A I'm not aware of any. I would take that simply to
16 mean a -- an affiliation by virtue of commonality in board
17 directors as well as a program affiliation.

18 Q That's the first time I'd seen that terminology and
19 I was just wondering whether there was anything different
20 now --

21 A Um-hum.

22 Q -- about the relationship between CET and Trinity
23 than had existed prior to this time.

24 A I certainly cannot think of any.

25 Q Would you turn to Mass Media Exhibit 276?

1 A Yes, sir.

2 Q This is a special meeting of the board of Trinity
3 Christian Center of Santa Ana that occurred on August 23,
4 1989, and I would like you to read to yourself the third
5 paragraph beginning with "the president reported."

6 A Yes, sir, I see that paragraph.

7 Q I take it in respect to the line of credit that
8 there were documents such as a note and a security agreement
9 drawn up that formalized the relationship between Trinity and
10 Tri-State?

11 A In this case there were, yes.

12 Q On page 2, now read to yourself the first paragraph
13 that's there.

14 (Pause.)

15 A Yes, sir, I've read that.

16 Q With respect to a loan to Sunlight, would I be
17 correct that there was a note that was prepared to formalize
18 the arrangement between Trinity and Sunlight?

19 A Yes, sir.

20 Q Moving on to the next paragraph, if you could read
21 that to yourself.

22 (Pause.)

23 A Yes, sir, I've read it.

24 Q First of all, had the board of directors of National
25 Minority TV made a request to Trinity for a loan of up to

1 2 1/2 million dollars?

2 A I don't have any independent recollection. Minutes
3 of NMTV would have to be consulted to confirm that.

4 Q And if there were no such minutes -- what I'm asking
5 is whether the request or the asking for a loan of up to 2 1/2
6 million dollars was something that followed board action by
7 National Minority TV or was there some other mechanism at
8 work?

9 A I think the, the minutes of NMTV will confirm that
10 the, the project here in Portland was approved and envisioned
11 by the NMTV board. Whether or not individual board meetings
12 were held for each need as we progressed with that project, I,
13 I, I just don't know. I, I seriously doubt it, so I just
14 can't tell you if a -- an individual board meeting were held
15 to confirm this particular portion of the loan.

16 Q Would it be fair to state that essentially whatever
17 money National Minority was going to need, Trinity was going
18 to loan it without a note, without interest, regardless of any
19 specific request on the part of the board of National Minority
20 TV?

21 A Mr. Shook, it was always understood, certainly by me
22 and I believe by all the other members of the boards of both
23 National Minority and Trinity, that Trinity was to be the
24 sponsoring corporation to this new entity. It was clearly
25 understood that the funds would be loaned; that a careful

1 accounting of those funds received would be recorded; and
2 certainly in my mind I believed and hoped that the day would
3 come when NMTV would become sufficiently viable to repay those
4 loans, but to, to try and memorialize each and every small,
5 medium, and large transfer of funds would have been a -- an
6 onerous chore to, to, to place upon us. So we simply knew
7 that a careful record of those funds was accumulating and that
8 at some future date, if and when the company became viable and
9 could become totally self-sustaining and, and emancipated,
10 yes, it would -- it is my hope today that NMTV will in some
11 way and in someday be able to repay those loans back to
12 Trinity. The record is clear in some cases, in the Odessa
13 station, we, we forgave some debt to Prime Time Television
14 because they -- it was clear that the Odessa station couldn't
15 repay those funds. Our intent all along, as I've stated so
16 clearly for the record, was donative. It was like a, a mother
17 church sponsoring another little church across town, sending
18 members over, sending deacons over, sending funds over to help
19 that church get established. There was never a motive of
20 profit or an intent to extort large, you know, percentages of
21 interest. It, it was basically donative in its intent, and,
22 yes, to answer your question specifically, it was always
23 understood by me, and I believe all the members of the board,
24 that these loans would come from Trinity to National Minority.
25 Q All right, this is now August of 1989 --

1 JUDGE CHACHKIN: Well, did we get the answer to the
2 question? There were no formal loan notes exchanged by the
3 parties as there were in the other two cases, was that cor-
4 rect?

5 DR. CROUCH: That is correct, Your Honor.

6 JUDGE CHACHKIN: All right.

7 MR. SHOOK: That was, that was at the first part of
8 the answer. I didn't --

9 JUDGE CHACHKIN: I didn't, I didn't know if we had
10 got that answer.

11 MR. SHOOK: Right, no, it was there.

12 BY MR. SHOOK:

13 Q The question I have for you now is we're in, we're
14 in August of 1989 and National Minority has been on the air
15 for 10 months in Odessa and it's on the air in Fresno. It has
16 a number of other permits at this stage. Was there a business
17 plan, any plan in place, for National Minority to break away,
18 any written plan in existence that would reflect when National
19 Minority was supposed to break away from Trinity?

20 A I know of no such written plan.

21 Q And that would be at any point in time, not only
22 this period of time but any point in time.

23 A Correct.

24 Q Would you please turn to Mass Media Exhibit 280?

25 A Yes, sir, I'm there.

1 Q This is the newsletter for October of 1989. Could
2 you turn to page 3?

3 A Yes, sir.

4 Q And do you see the listing of stations at the first
5 caption?

6 A Yes.

7 Q Now, what, if any, common thread exists among those
8 stations that are listed there?

9 A Just as I've stated before, this would be TBN owned
10 and operated stations with a commonality of board members.

11 Q And do you recognize that among that group we have
12 the CET stations as well as the Midland/Odessa station?

13 A Yes, sir.

14 Q Would you please turn to Mass Media Exhibit 281?
15 First of all, can you identify for us George Murray?

16 A Yes, George Murray functions directly under
17 Mr. Ben Miller in engineering. He would be like Mr. Miller's
18 first lieutenant. He also carries the title of chief engineer
19 for Channel 40/Santa Ana, California.

20 Q Now this memo, Mr. Murray identifies himself as
21 network operations director. Do you see that?

22 A Yes.

23 Q And what, what is involved in being the network
24 operations director?

25 A It would be the administrative head over both the

1 production department as well as the Channel 40 engineering
2 department.

3 Q Now do you see what this memo reflects? It
4 reflects -- it seems to reflect a transfer of equipment to
5 Channel 24 in Portland. Do you see that?

6 A Yes, sir.

7 Q Would similar memos have been prepared relative to
8 transfers of equipment to other TBN stations?

9 A No, sir. Not, not typically.

10 Q And why not?

11 A Simply because to other wholly-owned and operated
12 stations, that really would not have been necessary. I
13 believe this is being broken out separately here so that the
14 assets being transferred could be properly recorded on the, on
15 the books of National Minority.

16 Q I see. What you're saying then is that -- if I
17 mischaracterize you, tell me -- that because this memo is
18 being sent by Mr. Murray to the accounting person,
19 David Sumners, that this is for purposes of letting the
20 accounting department know to record the proper entries on the
21 books so that National Minority will -- are they going to owe
22 something as a result of this or is it simply that they now
23 have additional assets? That seems to be unclear to me.

24 A It, it was my understanding that this equipment was
25 a, a gift of either surplus or existing TBN equipment to the

1 Portland station.

2 Q And no such similar transfers were made relative to,
3 say, Dallas, when Dallas was being built or any other station?

4 A I'm not aware of any such similar transfer.

5 Q Were you involved in any way in approving this
6 action? Did you have to approve this action?

7 A I, I may have. I was generally aware that there
8 were some items of equipment that were available from the TBN
9 inventory in Southern California that could be of benefit to
10 the, the Portland station, and I was generally aware of and
11 agreed to the, the transfer of this equipment.

12 Q All right, but you have no specific recollection of
13 having done so?

14 A No, sir, I do not.

15 Q Please turn to Mass Media Exhibit 283.

16 A Yes, sir.

17 Q There appears to be the affiliation agreement
18 between National Minority TV and Trinity Broadcasting relative
19 to Channel 24 in Portland, and that the agreement was entered
20 into on December 4, 1989. Do you see that?

21 A Yes, sir.

22 Q Now would you please turn to page 11?

23 A Yes, sir, I'm there.

24 Q Can you identify the signature under Trinity
25 Broadcasting Network?

1 A Yes, that is my signature.

2 Q Do you have any recollection of how this agreement
3 came to you? How, how it evolved, how it came to you for
4 signing?

5 A Mrs. Duff brought it to me.

6 Q Had you had any prior discussions with her about
7 what the terms of the affiliation agreement should be?

8 A I don't recall any specific conversation, no, sir.

9 Q Did you review this affiliation agreement to under-
10 stand what the terms were prior to signing it, or did you
11 simply sign it when she presented it to you?

12 A I was generally aware of the terms of the standard
13 affiliation agreement and either Channel 24 is about to or has
14 just signed on the air and it was simply time to enter into
15 this affiliation agreement.

16 Q Would you say that you had negotiated with anyone
17 with respect to this agreement or that you simply signed it
18 because Mrs. Duff presented it to you?

19 A I don't recall any particular negotiations. It was
20 just the standard affiliation agreement that virtually all of
21 our program affiliates had entered into, so I, I don't recall
22 that any particular negotiations were necessary or even
23 appropriate.

24 Q So it would be your testimony that you are unaware
25 of any specific provisions in here that are peculiar to a

1 National Minority affiliation as opposed to any other affilia-
2 tion?

3 A That is correct.

4 Q Would you please turn to Mass Media Exhibit 285?

5 A Yes, sir.

6 Q And you'll recognize that this is an application or
7 at least part of -- it's not the entire application but part
8 of an application for a low-power station for National
9 Minority Television for Channel 61 in Stockton, California.

10 A Yes, sir, I see that.

11 Q And if you turn to page 9, you will see that it's
12 represented in the application that the intention of National
13 Minority TV -- and from other records we know that the filings
14 actually took place with respect to Columbia, South Carolina;
15 Portland, Maine; Sacramento, California; and Huntington, West
16 Virginia. Can you see that?

17 A Yes, sir.

18 Q Now, did you have any involvement in determining
19 which markets National Minority TV should apply for during
20 this filing window?

21 A No, sir, Mrs. Duff, as I understand it, in coopera-
22 tion with the TBN engineering department, selected these
23 markets.

24 Q Would you please turn to page 4?

25 A Yes, sir.

1 Q This is the Certification of Preferences page?

2 A Yes.

3 Q Did you have any conversation with anyone to deter-
4 mine the propriety of claiming the minority preference on
5 behalf of National Minority TV?

6 A No, sir.

7 Q Did you have any conversation with anyone to deter-
8 mine the propriety of the answers given relative to the diver-
9 sification preference?

10 A No, sir.

11 JUDGE CHACHKIN: I'd like to raise a question at
12 this point. That's curiosity. Did TBN file any low-power
13 applications for lottery consideration? TBN itself, or was it
14 simply NMTV that filed the applications? Are you aware of any
15 TBN applications filed for low-power lottery consideration?

16 DR. CROUCH: Your Honor, I believe Trinity did file.
17 I know they -- Trinity filed for a number of low-power, and it
18 is my belief, I would have to confirm that but it is my
19 belief, that some of them were under the lottery provisions.

20 JUDGE CHACHKIN: Parties, know what the facts are
21 there?

22 MR. COHEN: My recollection of Mrs. Duff's testi-
23 mony, Your Honor, and, and perhaps Mr. Topel will disagree
24 with it, is that Mrs. Duff specifically testified that Trinity
25 did not.

1 JUDGE CHACHKIN: Well, that's, that's what I was
2 under the impression, that Trinity did not file any applica-
3 tions; Trinity merely purchased low-power, acquired low-power.

4 MR. COHEN: That's what Mrs. Duff testified.

5 MR. TOPEL: That's my understanding, and I believe
6 Trinity -- I don't know if there was testimony but I
7 believe -- my understanding is that Trinity either pur-
8 chased -- filed for purchases and filed for modifications of
9 stations.

10 JUDGE CHACHKIN: Of existing --

11 MR. TOPEL: Right.

12 MR. COHEN: Yes, that's, that's my, that's my recol-
13 lection of Mrs. Duff's testimony.

14 JUDGE CHACHKIN: Do you disagree with that then?

15 DR. CROUCH: I, I may stand corrected, Your Honor.
16 I, I certainly believe that Trinity did file on some occasions
17 for unbuilt -- you know, for, for brand new CP's, but --

18 MR. TOPEL: Your counsel indicates that's not the
19 case. Do you disagree with that?

20 MR. TOPEL: Your Honor, if I might, that's my under-
21 standing but I was not counsel during the period in question
22 so I would have to --

23 JUDGE CHACHKIN: Well, if there are I, I think the
24 record should reflect that. You recall I previously asked
25 Dr. Crouch the question whether there was a policy, and I

1 | believe Mr. Shook had asked the same question, was there any
2 | kind of policy as to which low-power stations Trinity would
3 | file for and which ones NMTV would file for --

4 | DR. CROUCH: Um-hum.

5 | JUDGE CHACHKIN: -- and if, in fact, Trinity did not
6 | file for any low-power stations and only NMTV filed for low-
7 | -power stations, then it would indicate that there was some
8 | sort of understanding as to who would file for what.

9 | MR. COHEN: Well, Your Honor, I asked Mrs. Duff that
10 | question because --

11 | JUDGE CHACHKIN: Well, I wanted to find out from
12 | Dr. Crouch what his view was, and so it would seem, if that
13 | was the case -- assuming those are the facts, it would seem
14 | that there was some kind of policy, whether it was written or
15 | oral, whereby only NMTV would file for low-power -- file
16 | low-power applications and claim a minority preference --

17 | MR. COHEN: That's exactly what Mrs. Duff testified.

18 | JUDGE CHACHKIN: -- which Trinity could not claim.
19 | Isn't that, isn't that what happened?

20 | DR. CROUCH: That probably is what happened,
21 | Your Honor. It certainly made more sense for National
22 | Minority to, to claim that preference and have a better chance
23 | of, of receiving the permit, and, indeed, sir, that is exactly
24 | what National Minority was, was created to do.

25 | JUDGE CHACHKIN: All right, go ahead, counselor.

1 BY MR. SHOOK:

2 Q Dr. Crouch, could you please turn to Mass Media
3 Exhibit 288?

4 A Yes, sir, I'm there.

5 Q Do you recall receiving this letter on or about
6 December 15, 1989?

7 A Yes, sir, I do.

8 Q And did this letter come as a surprise to you or did
9 you know that such a letter was coming?

10 A I, I knew this letter was probably coming because
11 Mr. McLelland had spoken to me personally about his desire to
12 leave the employ of Trinity, and move to Portland and become
13 the station manager for the, for the NMTV station up there.

14 Q Did you have any conversations with him as to what
15 that would mean, what a change in employment from Trinity to
16 National Minority, would mean with respect to his insurance
17 situation?

18 A No, sir. I recall this pretty clearly. It was one
19 of those little passing encounters in the hall and I simply
20 referred him to Mrs. Duff to go speak to her about that possi-
21 bility.

22 Q Could you please turn to Mass Media Exhibit 290?

23 A Yes, sir.

24 Q Were you aware that your brother Phillip was sending
25 such a letter?

1 A I'm not at all familiar with this particular letter
2 but I certainly understood and agreed in principle that
3 Trinity would take whatever steps necessary to either loan
4 funds or guarantee performance by National Minority.

5 Q In the past when a new Trinity company was coming
6 into being such as Trinity Broadcasting of Texas, and it was
7 building its own station in Dallas, did Trinity Broadcasting
8 Network provide similar guarantees?

9 A It, it may have. I just don't recall.

10 Q You don't know?

11 A I, I don't know.

12 Q Could you turn to Mass Media Exhibit 291?

13 A Yes, sir.

14 Q The second-to-the-last paragraph down at the bottom
15 of the first page, just read that to yourself. It begins
16 "Praise the Lord, almost one a week in 1989."

17 A Yes. Yes, sir, I've read that.

18 Q Now that last sentence reads, "Three full-power
19 affiliated stations and one for National Minority in
20 Portland." Can you explain why it is that you seem to be
21 distinguishing between full-power affiliated stations on the
22 one hand and National Minority on the other?

23 A I, I'm not sure who these three affiliated stations
24 are from this text.

25 Q Well, would it be fair to assume that -- and I'll

1 check on page 2, but I think the author is you -- would it be
2 fair to assume that what you're talking about are stations
3 that are licensed to entities such as All-American or
4 Tri-State, those which have no commonality of board members
5 between Trinity and that, and that company?

6 A That, that certainly would be one explanation.

7 Q Well, I'm -- wouldn't that be the likely explana-
8 tion?

9 A I believe it would be, yes, sir.

10 Q Now could you turn to page 3?

11 A Yes, sir.

12 Q Now did you have any role in preparing the listing
13 of stations that are noted here?

14 A No, sir, I -- I'm sure I directed the inclusion of
15 this directory but, no, sir, I did not have a hand in picking
16 and identifying where each station was, or who the owner was,
17 or where it was located, the channel number, et cetera.

18 Q Now, just to clarify something, I take it the sta-
19 tions in the large print are the full-power stations and the
20 stations in the small print are low-power stations?

21 A Yes, sir.

22 Q And also there seems to be another, another piece of
23 information here that's different from the last listing like
24 this that we saw, and that is a little star appears in front
25 of stations that are identified as affiliated stations.

1 A Yes.

2 Q And at least in that sense, this list reflects that
3 if you go to Portland that's got a little star in front of it,
4 so that would suggest that that's an affiliated station.

5 A Yes.

6 Q And if you go over to Texas, you will see that
7 Dallas does not have a star but Beaumont, Harlingen, Houston,
8 and Midland do.

9 A Yes.

10 Q Now, did you have any role in how this -- and I ask
11 you again, did you have any role in how this was put together
12 and why it is that the various stations are noted as they are?

13 A No, sir, I did not.

14 Q Do you know who did?

15 A My belief is that Mrs. Duff compiled this listing.

16 Q All right, now if you turn to page 5 and you see at
17 the bottom "there are studios located at"?

18 A Yes, sir.

19 Q Now, how did it come about or can you explain how it
20 came about that some of the stations that are noted as affili-
21 ated stations on page 3 appear in this listing on page 5, the
22 "studios located at," but that other full-power stations are
23 not so listed on page 5?

24 A Can you give me an example? I --

25 Q Well, for example, we have -- on page 5 Portland,

1 Harlingen, Beaumont, Houston, and Midland/Odessa appear, and
2 on page 3 they appear as affiliated stations, but the first
3 one on the list, for example, on page 3, Gadsden, Channel 60,
4 does not appear on page 5; and if we go down to California on
5 page 3, San Jose is listed as a full-power station but it does
6 not appear on page 5.

7 A Remember again, Mr. Shook, the purpose of this
8 "studios located at" was for the convenience of, of the, the
9 partners of TBN in the individual cities to direct them to the
10 location of their station's studio. Obviously, we couldn't
11 provide this information for every affiliated station lest we
12 would have soon filled up one whole page. So we limited the
13 "studios located at" to only those stations that Trinity had
14 an interest in by virtue of commonality of board members.

15 Q Would you turn to Mass Media Exhibit 293?

16 A Yes, sir.

17 Q And for purposes of my questioning also look at Mass
18 Media Exhibit 294, the first page. What I want to bring to
19 your attention and have you help me with is that, if you look
20 at the title for Mass Media Exhibit 293 it says "Annual
21 Meeting of National Minority TV" and the date is January 15,
22 1990. If you look in the first --

23 MR. COHEN: January 16th.

24 BY MR. SHOOK:

25 Q If you look in the first paragraph of the minutes,

1 and the first paragraph says that the meeting took place on
2 January 16, 1990. Now when you go to the Trinity combined
3 meetings, or Trinity meeting, it reflects in the first para-
4 graph that that meeting took place on January 15, 1990. So
5 first off, with respect to the 1990 board meeting for National
6 Minority, did that take place on the same day as the Trinity
7 meeting or was it on a different day?

8 A Do you want me to tell you what I think happened
9 here?

10 Q No, I want you -- if you can remember, tell us. If
11 you have no recollection at all, you have no idea what hap-
12 pened, you can also tell us that.

13 A I have no independent knowledge or memory of exactly
14 why there is this discrepancy of dates here. I can only tell
15 you that typically the annual combined meetings of Trinity
16 Broadcasting Network and affiliated stations takes 2 days,
17 typically a Monday and a Tuesday. This is either a typograph-
18 ical error or it may have been that National Minority as, as
19 usual sat in on the Trinity meeting on the 15th and then
20 conducted its own independent board meeting on the 16th. That
21 is my best belief.

22 Q All right, but it would then be fair to say that you
23 really don't remember.

24 A No, sir, I do not.

25 Q Now with respect to the minutes for National

1 Minority, Exhibit 293, there are a listing, a listing of
2 persons present in the first paragraph. Do you see that?

3 A Yes, sir.

4 Q Do you recall being in attendance at a meeting at
5 which both Mr. McLelland and Miss Eve attended and partici-
6 pated?

7 A I'm sorry, sir, what was the question again?

8 Q All right, look at the first paragraph and that will
9 give you some information as to who was at the meeting.

10 A Yes, sir, I see that.

11 Q Now, from this meeting, it appears that the -- there
12 were four persons present, yourself, Mrs. Duff, Mr. McLelland,
13 and Miss Eve.

14 A Yes.

15 Q Does that comport with your recollection?

16 A Yes, sir, I believe it does.

17 Q Now how did it come about that David Espinoza was
18 elected to be secretary-treasurer of National Minority TV?

19 A He had held that title for some time and was simply
20 reconfirmed in that office.

21 Q Do you have any knowledge as to whether the agenda
22 for this meeting was transmitted to Reverend Espinoza prior to
23 the meeting taking place?

24 A No, sir.

25 Q Now I see in the first paragraph there seems to be

1 some distinction between the titles of McLelland and Eve.
2 McLelland is identified as a station manager; Eve is identi-
3 fied as the station supervisor. Do you see that?

4 A Yes.

5 Q Now is there supposed to be something of signifi-
6 cance to that?

7 A No, sir. I, I, I seem to vaguely recall that
8 Darlene Eve was sort of filling in on pretty short notice due
9 to the resignation of the former station manager, and it may
10 be that she was not yet promoted to full station manager.
11 That's generally the kind of a dim recollection in my mind.

12 Q Do you have a recollection that yesterday we went
13 over some minutes of a special meeting of Trinity Broadcasting
14 Network and there was a classification of stations, Class 1,
15 Class 2, Class 3?

16 A Yes, sir.

17 Q And that there were different titles to be given to
18 the person who was going to be in charge of such a station?

19 A Yes.

20 Q Now, does that have some bearing on the different
21 titles that are used for Mr. McLelland and Miss Eve here?

22 A I, I just don't know. I, I don't know. I don't
23 know.

24 Q Was there some difference in the nature of the, of
25 the facilities between Portland and Odessa? Was one more

1 | elaborate or, you know, more equipment than the other?

2 | A At, at first there would have been no difference.
3 | They, they both had simply a transmission building and a
4 | corner of that building designated for a master control or
5 | tape origination facility. Portland subsequently did acquire
6 | and remodel a, a building for a full-fledged studio, so that,
7 | that may have been in the minds of, of the directors here in
8 | this meeting but I'm really only speculating.

9 | Q Yeah, I'd prefer you not to do that. This is going
10 | to be difficult enough to follow without speculation.

11 | A I understand.

12 | Q In terms of the election of officers, what happened
13 | with respect to Terry Hickey or -- excuse me, not Terry Hickey
14 | but Phillip Crouch, or Matthew Crouch, or Charlene Williams,
15 | persons who had been previously identified as assistant secre-
16 | taries?

17 | A I think by now my brother Phillip had moved on to
18 | Texas; and as to why Mrs. Williams and Terry Hickey were not
19 | reconfirmed as assistant secretaries, I just don't recall.

20 | Q Well, frankly, I can tell you I misspoke with
21 | respect to Mr. Hickey because, you know, we do have
22 | information and I believe you confirmed this that Mr. Hickey
23 | was during this period of time involved in All-American.

24 | MR. COHEN: Yes, he was gone.

25 | DR. CROUCH: That's right, he had moved on, also,